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U.S. DISTRICT COURT E.D.N.Y.

EJK:NS

F.#2012R00570

★ MAY 18 2012 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

CAMILLE SOLOMON-EATON,

Defendant.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE

(Sexual Exploitation of a Child)

1. On or about October 5, 2011, within the Eastern District of New York, the defendant CAMILLE SOLOMON-EATON did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "IMG00116-20111005-1132.jpg," "IMG00119-20111005-1134.jpg," "IMG00120-20111005-1135.jpg" and "IMG00121-20111005-1135.jpg," which visual depictions were produced using materials

INDICTMENT  
CR 12 -

352

CR. No. \_\_\_\_\_  
(T. 18, U.S.C., §§  
2251(a), 2251(e),  
2252(a)(2), 2252(b)(1),  
2253 and 3551 et seq.;  
T. 21, U.S.C., § 853(p))

MATSUMOTO, J.

20 HORELSKY, M.J.

that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: a cellular telephone.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT TWO  
(Sexual Exploitation of a Child)

2. On or about October 7, 2011, within the Eastern District of New York, the defendant CAMILLE SOLOMON-EATON did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "IMG00132-20111007-0955.jpg," "IMG00133-20111007-0955.jpg" and "IMG00134-20111007-0956.jpg," which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: a cellular telephone.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT THREE  
(Sexual Exploitation of a Child)

3. On or about October 11, 2011, within the Eastern District of New York, the defendant CAMILLE SOLOMON-EATON did knowingly and intentionally employ, use, persuade, induce, entice

and coerce a minor, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the image depicted in computer file "IMG00196-20111011-0958.jpg," which visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: a cellular telephone.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNTS FOUR THROUGH ELEVEN  
(Distribution of Child Pornography)

4. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant CAMILLE SOLOMON-EATON did knowingly and intentionally distribute one or more visual depictions, to wit: the images depicted in the following computer files:

<u>COUNT</u>	<u>FILENAME</u>	<u>DATE</u>
FOUR	IMG00116-20111005-1132.jpg	October 5, 2011
FIVE	IMG00119-20111005-1134.jpg	October 5, 2011
SIX	IMG00120-20111005-1135.jpg	October 5, 2011
SEVEN	IMG00121-20111005-1135.jpg	October 5, 2011
EIGHT	IMG00132-20111007-0955.jpg	October 7, 2011
NINE	IMG00133-20111007-0955.jpg	October 7, 2011
TEN	IMG00134-20111007-0956.jpg	October 7, 2011
ELEVEN	IMG00196-20111011-0958.jpg	October 11, 2011

using a means and facility of interstate commerce and which visual depictions had been mailed, and shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that upon her conviction of any of Counts One through Eleven, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253, of (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses of conviction; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses of conviction or any property

traceable to such property, including, but not limited to, one Blackberry Curve cellular telephone.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

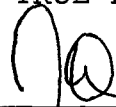
e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any

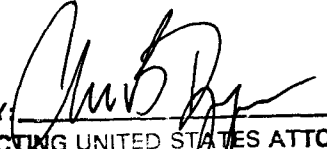
other property of the defendant up to the value of the  
forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2253; Title 21,  
United States Code, Section 853(p))

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

  
BY: \_\_\_\_\_  
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 U.S.C. § 136

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

*EASTERN District of NEW YORK*

**CRIMINAL DIVISION**

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**THE UNITED STATES OF AMERICA**

vs.

*CAMILLE SOLOMON-EATON,*

Defendant.

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**INDICTMENT**

(T. 18, U.S.C., §§ 2251(a), 2251(e), 2252(a)(2),  
2252(b)(1), 2253 and 3551 et seq.; T. 21, U.S.C., § 853(p))

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*A true bill.*

\_\_\_\_\_  
Foreman

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*Filed in open court this \_\_\_\_\_ day, of \_\_\_\_\_ A.D. 20 \_\_\_\_\_*

\_\_\_\_\_  
Clerk

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*Bail, \$ \_\_\_\_\_*

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*Nadia I. Shihata, Assistant U.S. Attorney (718-254-6295)*